

IN THE CIRCUIT COURT OF ALCORN COUNTY, MISSISSIPPI

CINDY ARMSTRONG

USDC 1:16cv67-GHD-DAS

PLAINTIFF

VS.

CAUSE NO.

Civil-184A

THE KROGER COMPANY

DEFENDANT

COMPLAINT

Jury Trial Demanded

COMES NOW, Plaintiff Cindy Armstrong, by and through counsel, and files her complaint against the above named Defendant The Kroger Company (hereinafter "Kroger"), and shows the following in support:

1. Plaintiff is an adult resident citizen of Alcorn County, Mississippi.
2. Defendant is believed to be a foreign corporation doing business within the State of Mississippi and may be served with process upon its registered agent Corporation Service Company, 5760 I-55 North, Suite 150, Jackson, Mississippi 39211.
3. This cause of action occurred in Corinth, Alcorn County, Mississippi, therefore jurisdiction and venue are proper with this Court.
4. On or about September 27, 2013, Cindy Armstrong drove her automobile to the Kroger gas pumps in Corinth, Mississippi, when she slipped, fell and was injured.
5. Kroger negligently caused Cindy Armstrong's injuries in the following way:
 - a. Creating a dangerous condition on its premises;
 - b. Failing to warn Cindy Armstrong of a dangerous condition on its premises;
 - c. Failing to clean the dangerous condition from its premises; and
 - d. Failing to keep its premises in a safe condition.

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APR 04 2016

JOE CALDWELL, CIRCUIT CLERK

BY [Signature]

6. As a direct result of Kroger's negligence Cindy Armstrong has suffered the following harms and losses:

- a. Past, present and future medical expenses;
- b. Pain and suffering;
- c. Loss of enjoyment of life; and
- d. Emotional distress.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays for a judgment in an amount to be determined by the jury and for any other relief deemed appropriate and necessary.

Respectfully Submitted this the 25th day of March, 2016.



ATTORNEY FOR PLAINTIFF

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